

Exhibit X

Declaration of Ronnie Smith

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

STATE OF TENNESSEE, <i>ex rel.</i>)
JONATHAN SKRMETTI,)
Attorney General and Reporter,)
)
Plaintiff,)
)
vs.)
)
IDEAL HORIZON, d/b/a SOLAR TITAN,)
USA, <i>et al.</i> ,)
)
Defendants.)

DECLARATION OF RONNIE SMITH

I, Ronnie Smith, hereby state that I have personal knowledge of the facts set forth below.

If called as a witness, I would testify as follows:

1. I am a United States citizen and am over 18 years of age. I reside in Loudon County, Tennessee.
2. Around June 2020, I first encountered Jason Horton (Jason), a sales representative of Defendant, Ideal Horizon Benefits d/b/a Solar Titan USA (Solar Titan), when he came to my home after visiting my daughter. My daughter had a metal roof and was told by Jason that Solar Titan could not install solar panels on metal roofs. My daughter was the person that referred Jason to us since we were interested in a solar system.
3. During my initial meeting with Jason, he told me that if I purchased a system from Solar Titan, I would receive a tax rebate of approximately \$8,400. I could then use the money from the tax rebate to help pay the loan I had to take out in order to afford the solar panels.

4. Jason also promised our solar system would include 3 batteries to store any excess electricity generated by our solar panels. He also told me my electrical bill would not be over \$200 per month. Jason also told me the excess power generated as a result of the solar system would be bought back by the Loudon County Utility Board and a rebate check would be sent to me based on the number of kilowatts purchased.
5. Jason told me that if anything happened during the time the system was operational or while the system was being installed, personnel from Solar Titan would immediately respond to fix the problem. Jason told me the company would respond even during a storm if the power malfunctioned. Jason guaranteed good customer service.
6. After hearing the sales pitch from Jason, my wife and I decided to have 26 panels installed on our roof. I signed a contract with Solar Titan and financed the solar system through Solar Mosaic, a loan company working with Solar Titan. Jason told me that if I ever sell the house, the loan for the system would be transferred to the new home owners.
7. Approximately 2 weeks after I signed the contract with Jason, personnel from Solar Tian came to my home and installed the panels. When the installers were installing the panels, I was told personnel from Mosaic were there as well observing the installation.
8. I financed the entire system through Solar Titan and Mosaic. I believe I financed over \$20,000; however, I pay \$347.80 per month until the loan is paid off. I believe I have 5 or more years of payments.
9. I do not know the exact terms of my loan. I never received a copy of the contract for the loan. Everything I signed was electronic and I do not have email.

10. After the solar panels were installed on the roof, the roof began to leak. I contacted Solar Titan about the leaks. Personnel from Solar Titan came out to the house and told me the leaks were not caused by the solar panels.

11. Since Solar Titan would not fix the leaks, I contacted a local roofing company who came out to the house and examined the roof and where it was leaking. Personnel from the roofing company told me the roof leaks because of how the panels were installed. Even though it was Solar Titan that caused the leaks, I had to pay the roofing company to fix the areas where the roof was leaking.

12. I have complained several times to Solar Titan; however, my telephone calls have gone unanswered. Solar Titan told me the Solar panels are operational, but I still don't have batteries to store power. Jason told me I would receive 3 batteries which I have never received.

13. I still don't think the solar panels are working since my electric bills have not decreased. My electric bill is still around \$400 per month even though I was promised by Jason that my electric bill would be under \$200 per month.

I declare under penalty of perjury under the laws of the State of Tennessee and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this 15 day of Sept, 2022 in Kent's City (city/state).

Ronnie Smith
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